

Craig Sanders, Esq. (Cal Bar 284397)
Jacqueline Mandel, Esq. (Cal Bar 317119)
SANDERS LAW GROUP
333 Earle Ovington Blvd, Suite 402
Uniondale, NY 11553
Tel: (516) 203-7600
Email: csanders@sanderslaw.group
Email: jmandel@sanderslaw.group
File No.: 128569

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Global Weather Productions LLC,

Plaintiff,

v.

Armenian Media Group of
America, Inc.,

Defendant.

Case No. 2:23-cv-09515-SB-JC

**DECLARATION OF
JACQUELINE MANDEL IN
SUPPORT OF PLAINTIFF'S
RENEWED REQUEST FOR
ENTRY OF DEFAULT AGAINST
DEFENDANT ARMENIAN
MEDIA GROUP OF AMERICA,
INC.**

I, JACQUELINE MANDEL, declare:

1. I am a member of the Bar of this Court and am an associate attorney with the law firm of Sanders Law Group, attorneys for Plaintiff, Global Weather Productions LLC ("Plaintiff"), in the above-captioned action.

2. I have personal knowledge of the facts set forth in this Declaration and would testify to them in a court of law if required to do so.

3. I respectfully submit this Declaration in accordance with Rule 55(a) of the Federal Rules of Civil Procedure, in support of Plaintiff's application for a

1 certificate of default against Defendant, Armenian Media Group of America, Inc.
2 (“Defendant”).

3 4. This is an action seeking damages against Defendant for copyright
4 infringement under the Copyright Act, 17 U.S.C. §501.

5 5. Jurisdiction of the subject matter of this action is based upon 28 U.S.C.
6 § 1338(a) and 28 U.S.C. § 1331.

7 6. This Court has personal jurisdiction over Defendant as Defendant’s
8 principal place of business is in Los Angeles County, California.

9 7. The Complaint in this action was filed on November 10, 2023. (*Dkt.*
10 *No. 1*).

11 8. Plaintiff was unable to serve Defendant’s registered agent. Thus, on
12 January 25, 2024, Plaintiff filed an Unopposed Motion to Serve the California
13 Secretary of State. (*Dkt. No. 11*).

14 9. On January 31, 2024, the Court granted Plaintiff’s Motion and
15 authorized Plaintiff to serve Defendant through the California Secretary of State.
16 (*Dkt. No. 12*).

17 10. Thereafter, a true and correct copy of the Summons and Complaint
18 were served upon the California Secretary of State on February 14, 2024. (*Dkt. No.*
19 *13*).

20 11. On February 15, 2024 Proof of Service was filed with the Court. (*Id.*).

21 12. Consequently, an answer or responsive pleading was due from
22 Defendant on or before March 15, 2024. (*Id.*).

23 13. However, to date, Defendant has not answered or otherwise responded
24 to Plaintiff’s Complaint and the time for Defendant to do so has expired.

25 14. This action seeks judgment against Defendant for statutory and/or
26 actual damages and Plaintiff’s costs and attorneys’ fees in prosecuting this action.

1 15. Inasmuch as Defendant has failed to plead or otherwise defend in this
2 action, it is respectfully requested that a default be entered against Defendant.

3 16. Defendant is not in the military, an infant, or incompetent.

4 17. I declare under penalty of perjury of the laws of the United States that
5 the foregoing is true and correct.

6
7 Dated: March 26, 2024

8 **SANDERS LAW GROUP**

9 By: /s/ Jacqueline Mandel
10 Craig Sanders, Esq. (Cal Bar 284397)
11 Jacqueline Mandel, Esq. (Cal Bar 317119)
12 333 Earle Ovington Blvd, Suite 402
13 Uniondale, NY 11553
14 Tel: (516) 203-7600
15 Email: csanders@sanderslaw.group
16 Email: jmandel@sanderslaw.group
17 File No.: 128569
18 *Attorneys for Plaintiff*

